

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**DANYAL SHAIKH**

**V.**

**TEXAS A&M UNIVERSITY COLLEGE  
OF MEDICINE, MICHAEL K. YOUNG,  
PAUL OGDEN, M.D., AND MICHAEL L.  
BROWN, M.D.**

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**CIVIL ACTION NO. 4:16-CV-00591-H**

**UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANT MICHAEL L.  
BROWN, M.D. TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

**A. STIPULATION**

1. Plaintiff is Danyal Shaikh; Defendants are Texas A&M University College of Medicine, Michael K. Yound, Paul Odgen, M.D., and Michael L. Brown, M.D.
2. Plaintiff sued Defendant Brown for alleged medical and common law negligence.
3. Plaintiff filed Plaintiff's First Amended Complaint on June 1, 2016, naming Michael L. Brown as a Defendant. Defendant was served with the Summons and Complaint on June 7, 2016.
4. Defendant Michael L. Brown, M.D. is required to file his Answer or other responsive pleadings to Plaintiff's First Amended Complaint by June 28, 2016.
5. The parties have agreed that Defendant Michael L. Brown, M.D. may have until July 28, 2016 to file his Answer or other responsive pleadings to Plaintiff's First Amended Complaint, including Rule 12(b) motions.

**B. CONCLUSION**

6. For these reasons, the parties ask the Court to extend the time for Defendant Michael L. Brown, M.D. to file his Answer or other responsive pleadings to Plaintiff's First Amended Complaint, including Rule 12(b) motions, until July 28, 2016.

Respectfully submitted,

**COOPER & SCULLY, P.C.**

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on June 23, 2016 she conferred with Mr. Martin Cirkiel, counsel for Plaintiff, regarding the foregoing Motion to Extend Time to Respond to Plaintiff's First Amended Complaint and that Mr. Cirkiel indicated the Plaintiff is not opposed to the motion.

/Nisha P. Byers/

**NISHA P. BYERS**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been served upon all counsel of record via facsimile on this 24th day of June, 2016:

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/Nisha P. Byers/  
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